

1300 Pennsylvania Ave. NW 190-318  
Washington, D.C. 20004  
DOLiver.HeidarpourLawFirm@gmail.com  
TEL: (202) 234-2727



Dana J. Oliver, Esq  
CA BAR # 291082

November 11, 2024

**Via Email:** [terrance@mycareclub.com](mailto:terrance@mycareclub.com); [jordan@mycareclub.com](mailto:jordan@mycareclub.com); [smartjeremy@gmail.com](mailto:smartjeremy@gmail.com);  
[mitchell@mycareclub.com](mailto:mitchell@mycareclub.com)

**My Care Club, LLC**  
**ATTN: LEGAL DEPARTMENT**  
**8101 Biscayne Blvd Ste 506**  
**Miami, FL 33138**

**Re: Violation of the Telephone Consumer Protection Act**

To Whom It May Concern:

My Client, Fernando Seratos (Client), wishes to bring to your attention a telemarketing concern. In November of 2024, my Client received unsolicited telemarketing calls and texts to their wireless line 316-347-5248, from your company or some company on your behalf, from numbers 877-350-3768 and 754-231-0188. My Client did not provide their consent to your company to make these telemarketing texts and calls. It is my understanding that according to the Telephone Consumer Protection Act, it is illegal to make marketing calls or texts to any wireless line using an ATDS or Pre-Recorded message without first obtaining the express written consent of the recipient or business. Furthermore, the number in question is also on the National Do-Not-Call Registry.

Please forward to my attention all documents that evidence any purported consent to receive telemarketing texts and calls from your company, as well as any other documents that support your position there is no claim against your company, if that is your contention. Before my Client proceeds with a formal claim, they wish to give your company the opportunity to explain their actions. Please forward this information to my attention by November 18, 2024. If we do not hear from you by that time, my Client will consider all legal remedies available, including but not limited to, filing a claim in Federal Court. By sending this letter, you as well as any third parties that you worked with related to the telephone campaign at issue, are hereby notified of your obligation to preserve all electronic and non-electronic files regarding this claim. This includes, but is not limited to, all e-mail communications and records reflecting telephone calls and text messages.

Sincerely,

Heidarpour Law Firm, PLLC

  
Dana J. Oliver, Esq

**EXHIBIT "2"**